

# Exhibit 75

Mark Pollak

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UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

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IN RE JOHNSON & JOHNSON ) MDL No.  
TALCUM POWDER PRODUCTS ) 16-2738 (FLW)(LHG)  
MARKETING SALES PRACTICES, )  
AND PRODUCTS LIABILITY )  
LITIGATION )  
 )  
THIS DOCUMENT RELATES TO )  
ALL CASES )

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VIDEOTAPED 30(b)(6) DEPOSITION OF DEFENDANT  
PERSONAL CARE PRODUCTS COUNCIL,  
by and through its Designated Representative,

MARK POLLAK

WASHINGTON, D.C.

WEDNESDAY, AUGUST 29, 2018

9:30 A.M.

Reported by: Leslie A. Todd

Mark Pollak

<p style="text-align: right;">Page 102</p> <p>1 over the last ten years or is that a ten-year-old 2 number? 3 A It's approximately the same. I mean, in 4 a given year we may be higher than 600 or lower -- 5 but it's -- it's approximately the same over 6 the -- 7 Q And does the website get updated -- 8 A Yes. 9 Q -- on an annual basis to -- to show the 10 numbers? 11 A We -- we don't put an exact number 12 because at any given time during the year, the 13 number may be higher or lower. Sometimes we have 14 608, sometimes we have 592. So that's why we say 15 approximately 600. 16 Q Okay. And I would imagine that there's 17 information on your website that changes more than 18 once a year. 19 A Oh, yeah. 20 Q Okay. And -- and when information 21 becomes -- when there's new information that may 22 be relevant to the website, the website is 23 updated? 24 A Yes.</p>	<p style="text-align: right;">Page 104</p> <p>1 Q And when -- when -- when that roster 2 changes from time to time, is it changed on the 3 website? 4 A Yes. 5 Q What other kinds of things are changed 6 on a, you know, regular, weekly, monthly, 7 bimonthly basis on the website? 8 A So on the public website, that -- that's 9 the majority of it would be involving meetings and 10 upcoming events, webinars. 11 Q Okay. So as I understand it from your 12 previous deposition, there are two different kinds 13 of members; is that correct? 14 A Right. 15 Q And what are they? 16 A Active members are manufacturers and/or 17 distributors of finished products. Associate 18 members are the suppliers to them. 19 Q Okay. And so for our purposes, J&amp;J is 20 an active member? 21 A Yes. 22 Q And Imerys -- 23 A Would be an -- 24 Q -- if they're still a member --</p>
<p style="text-align: right;">Page 103</p> <p>1 Q And so -- I'm sorry, I may have asked 2 you this already, but the -- who is the -- kind of 3 the webmaster of the PCPC website? 4 A So currently it's Natasha Clover. But 5 we are -- as part of the website redesign process, 6 Jamie Kirk, who is in Public Affairs, will also be 7 working with her on updating features on the 8 website. 9 Q And does the website have -- is there a 10 blog on the website? 11 A No. 12 Q Is there information on the website that 13 changes or is added on a weekly basis? 14 A Could be, because we have different 15 meetings and events posted that way. And then if 16 we do a press release, but the -- the press 17 releases wouldn't be -- most of the time wouldn't 18 be more than once a month. 19 Q And the -- the -- is there a roster of 20 the members of the PCPC somewhere on the website? 21 A Yes. 22 Q And I imagine that changes from time to 23 time? 24 A Yes.</p>	<p style="text-align: right;">Page 105</p> <p>1 A Right, would be an associate. 2 Q -- is an associate member. 3 And how -- how's their dues structure 4 determined? 5 A Okay. So for active members, dues are 6 on a sliding scale based on their U.S. sales of 7 cosmetics, toiletries and fragrances. 8 The associate members has different 9 ways -- for Imerys, for an ingredient supplier, it 10 is a sliding scale based on their U.S. sales of 11 ingredients to the cosmetics industry. 12 Q So -- 13 A With a -- with a cap on what they would 14 pay. 15 Q Okay. And so what did -- what did J&amp;J 16 pay for membership last year? 17 A If I recall, it was a little -- it was 18 in the \$490,000 range. 19 Q Is there any company that pays more than 20 them? 21 A Yes. 22 Q Who? 23 A Well, it's considered confidential 24 information we tell companies on the dues form.</p>

27 (Pages 102 to 105)

Mark Pollak

<p style="text-align: right;">Page 106</p> <p>1 There are at least five companies that pay more.</p> <p>2 Q And out of those five companies, what --</p> <p>3 what's the highest dues amount?</p> <p>4 A I think the -- our largest member is</p> <p>5 paying over 1.1 million a year now. The second</p> <p>6 largest would be 900-something, and then two</p> <p>7 companies in the 700s and one in the 600s.</p> <p>8 Q And has J&amp;J been a member at least since</p> <p>9 you've been with the company?</p> <p>10 A Yes.</p> <p>11 Q And again, that's how many years?</p> <p>12 A Thirty-five.</p> <p>13 Q And if we looked at a -- if we looked at</p> <p>14 a graph over the last 35 years, approximately how</p> <p>15 much on an annual basis does J&amp;J pay?</p> <p>16 MR. LOCKE: Do you mean by percentage?</p> <p>17 MR. GOLOMB: No. He gave me --</p> <p>18 THE WITNESS: So they -- they --</p> <p>19 BY MR. GOLOMB:</p> <p>20 Q I'm sorry, let me be clear.</p> <p>21 You gave me an amount of \$490,000 for</p> <p>22 last year, and so if we look back 35 years, has</p> <p>23 that been a pretty steady number? Has it gone --</p> <p>24 has it fluctuated?</p>	<p style="text-align: right;">Page 108</p> <p>1 they're -- the -- the number of brands they're</p> <p>2 paying on has increased in the U.S.</p> <p>3 Q Is it fair to say that over the last 30</p> <p>4 years that, just using your kind of loose range of</p> <p>5 numbers, that J&amp;J has paid in excess of \$15</p> <p>6 million in -- in dues?</p> <p>7 A I think that's --</p> <p>8 Q Does that sound about right?</p> <p>9 A I think that's probably on the high</p> <p>10 side.</p> <p>11 Q Well, what would you say?</p> <p>12 A If -- I would say the average would be</p> <p>13 no higher than \$200,000 a year, and probably less.</p> <p>14 So for 30 years, doesn't that put us below</p> <p>15 6 million?</p> <p>16 Q And then that doesn't cover what they</p> <p>17 paid into the task force, correct?</p> <p>18 A Yes. That's separate.</p> <p>19 Q Right. And -- and any other task force</p> <p>20 they may be contributing into that we haven't</p> <p>21 talked about.</p> <p>22 A Right.</p> <p>23 Q And do we know whether or not there are</p> <p>24 other task forces that they're involved in?</p>
<p style="text-align: right;">Page 107</p> <p>1 A It's gone up substantially.</p> <p>2 Q From what to what?</p> <p>3 A I think they -- in the '80s they</p> <p>4 probably paid in the \$40,000 range -- forty,</p> <p>5 50,000. They were a much smaller -- much smaller</p> <p>6 company in this space, and during that time they</p> <p>7 acquired a lot of other major brands that they pay</p> <p>8 dues on. For example, Neutrogena cosmetics,</p> <p>9 Aveeno, Listerine mouthwash, et cetera.</p> <p>10 Q And when did that change?</p> <p>11 A A different -- different year. I don't</p> <p>12 know which acquisition was which year.</p> <p>13 Q But you said in the '80s, they were</p> <p>14 paying about forty to \$50,000 a year, and --</p> <p>15 A Right. And starting in the '90s, they</p> <p>16 had -- there were a series of acquisitions.</p> <p>17 Q And were they -- so what were they</p> <p>18 paying? Just generally, and we're not holding you</p> <p>19 to --</p> <p>20 A And, again, there have -- there have</p> <p>21 been some dues rate increases. But I would say</p> <p>22 ten years ago, they were probably paying two, 250.</p> <p>23 Q Okay. And in the last ten years?</p> <p>24 A I think their dues have gone up because</p>	<p style="text-align: right;">Page 109</p> <p>1 A Yes, there are.</p> <p>2 Q How many?</p> <p>3 A I don't know how many, but I know they</p> <p>4 would have made substantial contributions to the</p> <p>5 sunscreen task force because that's a major</p> <p>6 category for them.</p> <p>7 Q When you say "major contribution," how</p> <p>8 much are we talking about?</p> <p>9 A 100,000, 200,000. I don't recall.</p> <p>10 Q And how long has that been active --</p> <p>11 A Sunscreen task force?</p> <p>12 Q Yeah.</p> <p>13 A I'd say 20 years.</p> <p>14 Q And have they been paying a hundred to</p> <p>15 \$200,000 --</p> <p>16 A No, it's not --</p> <p>17 Q -- for 20 years?</p> <p>18 A It's not an annual assessment. Again,</p> <p>19 it's as needed to fund the activities, and there</p> <p>20 are not solicitations every year.</p> <p>21 Q How many active years have there been</p> <p>22 over the last 20 years for the sunscreen</p> <p>23 committee?</p> <p>24 A I really don't know off the top of my</p>